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# California Regional Water Quality Control Board

## Central Valley Region

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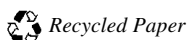
27 September 2005

### **ROOT CREEK WATERSHED COALITION ANNUAL MONITORING REPORT, CONDITIONAL WAIVER OF WASTE DISCHARGE REQUIREMENTS FOR DISCHARGE FROM IRRIGATED LANDS RESOLUTION NO. R5-2003-0105 AND MONITORING AND REPORTING PROGRAM ORDER NO. R5-2003-0826**

Attached is a copy of our memorandum reviewing the subject Annual Monitoring Report (Annual Report) provided by the Root Creek Watershed Coalition. After reviewing the subject report, we have concluded the following:

1. Future monitoring reports are to be complete and submitted by the prescribed deadline and are not to be submitted in segments.
2. Some Chain of Custody forms were incomplete. In the future, all Chain of Custody forms are to be completely filled out.
3. The Annual Report did not include, as proposed, a matrix and analysis of the Management Practices Questionnaire that was sent out to all farmers in the coalition. This must be provided to complete the subject report.
4. The Annual Report did not include an evaluation to determine patterns of pesticide/herbicide use in areas within the coalition, nor, was there any attempt to correlate the pesticide/herbicide usage data with specific irrigated lands. This evaluation needs to be completed and provided to complete the subject report.
5. Contrary to what the Watershed Evaluation states and based on historical aerial photos taken in the vicinity of monitoring site MS3, it is clear that some type of water runoff flows from RCWC irrigated lands to the San Joaquin River.
6. Contrary to the Watershed Evaluation provided by RCWC, irrigated lands within the subject watershed do use surface water for irrigation. Various hydraulic structures on the canal system have been identified visually and through historical aerial photos.
7. A detailed survey of the canal system and its various hydraulic structures needs to be performed to identify all return waterways to the irrigation canals and to Root Creek.

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8. The sampling trigger for stormwater sampling needs to be modified. The current trigger of three consecutive days of a half-inch of rain per day is unrealistic. A new sampling trigger needs to be developed and proposed.
9. The tabulated analytical results indicate that stormwater samples collected from monitoring site MS4 in both monitoring events showed that toxicity to *Selanastrum capricornutum* was observed. In both instances, a Toxicity Identification Evaluation was not performed as is required per the MRP.
10. Stormwater samples should be collected from monitoring site MS4 if ponded stormwater is observed, regardless if "active stormwater flow" is not occurring. This will provide data needed to perform required follow-up.
11. No sediment toxicity samples were collected in either sampling event. Given the record rainfall of last storm season, it would appear reasonable that an alternate location could have been identified and sampled. An alternate sampling site in the vicinity of MS4 needs to be identified and sediment samples need to be collected during future monitoring events.
12. The discontinuation of collecting background samples from monitoring sites MS1 and MS2 appears to be appropriate.
13. The data interpretation of section of the Annual Report did not contain comments on the detection of toxicity in both monitoring events at monitoring site MS4.

***Prior to 11 November 2005***, please provide us with a technical report the addresses the above items. Should you have any questions regarding this matter, please telephone Anthony Medrano at (559) 488-4395.

ORIGINAL SIGNED BY:

RUSSELL W. WALLS  
Senior Engineer  
RCE No. 43140

Enclosure

AM:am

cc: Mr. Tom Pinkos, Regional Water Quality Control Board, Rancho Cordova  
Mr. Bill Croyle, Regional Water Quality Control Board, Rancho Cordova  
Mr. Ken Landau, Regional Water Quality Control Board, Rancho Cordova  
Mr. Dennis Westcot, Regional Water Quality Control Board, Rancho Cordova